

Third I/M Summit Meeting Questions and Answers

Haskins Hobson, P.E.
I/M Team Coordinator
Department of Natural Resources
September 1, 2005

Questions

- St. Louis Area Asthma Statistics
- More Information about Sanctions
- 1-Hour and 8-Hour Control Measures
- EPA Credit for Safety Inspection?
- I/M as a Contingency Measure
- IM240 Emissions Standards

St. Louis Asthma Statistics

- 1,431,398 adults (18 or older) in non-attainment area in 2000
- 123,452 adults in non-attainment area diagnosed with asthma in 2003
- 128,677 emergency room visits, 30,696 hospitalizations and 419 deaths attributed to asthma between 1993 and 2002
 - Source: American Lung Association

Sanctions Requirement

- The Clean Air Act Amendments (CAAA) requires the EPA Administrator to impose highway fund and other sanctions on areas:
 - If states have not implemented adequate plans to attain air quality standards; or
 - If planned transportation improvements do not conform with State Implementation Plans for achieving air quality goals.
 - See sections 110(m), and 176, 179 of CAAA

Sanctions Progression

- Letter of intent to sanction begins 18-month “sanctions clock”. If state corrects the deficiency, threat of sanctions is removed.
- 2:1 emissions offsets for new or modified permitted industry (point and area) sources (immediately)
- Federal highway funding restrictions, except for traffic safety projects (6 months later)
 - If sanctioned, Illinois might jeopardize \$1.7 to 2.1 billion annually while under sanctions (April 2004 letter to IEPA from EPA Region 5 Administrator)
- Federal Implementation Plan (FIP) (24 months later)

Sanctions Frequency

■ From 1990 to 1999

- 858 Letters of intent to sanction
- Sanctions imposed 18 times (2%)
- Five state sanctions in effect as of October 15, 1999 Congressional Report
- FIP implemented for 6 counties in CA in 1995

Sanctioned States

■ Georgia

- Atlanta had federal funds worth \$1.9 billion withheld from 1998 to 2000 for conformity lapse

■ Pennsylvania

- Federal highway funds withheld in 1983 and 1984 for failure to implement an I/M program

■ Other States

- New York City, NY; Boston, MA; Burlington, VT; East Helena, MT; Omaha, NE; St. Louis, MO; Iron County, MO

EPA Credit for Safety Inspection?

- Safety inspection elements don't currently meet EPA regulations
 - Gas cap isn't pressure tested
 - Data from each inspection isn't collected or reported annually to EPA
 - Quality control/assurance, public information and consumer protection requirements not currently in place

I/M as a Contingency Measure

- I/M program may be transferred to a state's maintenance plan contingency measures once a nonattainment area is redesignated to 8-hour ozone attainment status
- A demonstration must be made to EPA indicating that I/M program is not needed to maintain 8-hour ozone standard
- I/M would be difficult to re-implement if a contingency measure were triggered

Implemented 1-hour Control Measures

From 1996 Rate of Progress Plan

POINT/AREA CONTROLS	TPD
• Petroleum Liquid Storage, Loading and Transfer	4.20
• Permanent Plant Closings	3.48
• Consumer and Commercial Solvents	3.27
• Architectural and Industrial Maintenance Coatings	3.05
• Alumax Foils	3.00
• Open Burning Ban	2.60
• Landfill Gases	1.48
• Federal Non-Road Small Engine Standards	1.22
• Solvent Cleaning	0.91
• Slay Bulk Terminal	0.74
• Auto Refinishing	0.78
• Solvent Metal Cleaning	0.64
• Voluntary Reductions	0.14
• Hazardous Organic NESHAPS	0.08

Possible 8-hour Control Measures

- Reformulation of Consumer Products (shifting to less reactive compounds) (VOC)
- Industrial Surface Coating (VOC)
- Portable Fuel Containers (VOC)
- Additional Consumer Solvents (VOC)
- Flares (VOC)
- Industrial, Commercial, and Institutional (ICI) boilers (SO₂ & NO_x)
- Portland Cement Plants (SO₂ & NO_x)
- Diesel Retrofits (NO_x & PM)
- Voluntary Measures (All)
- Water Heater Efficiency Standards (All)
- Locomotive (Auxiliary Power Units) and Barge Controls (All)
- Episodic Measures
- Extend Controls to Neighboring Counties
- Others

Final IM240 Emissions Standards (grams per mile)

Model Year	HC (gpm)	CO (gpm)	NOx (gpm)
Light Duty Vehicles			
1981-1982	0.8	30	2.0
1983-1995	0.8	15	2.0
1996 & Newer	0.6	10	1.5
Light Duty Trucks (Less Than 6000 lbs. GVWR)			
1981-1983	3.4	70	4.5
1984-1987	1.6	40	4.5
1988-1995	1.6	40	2.5
1996 & Newer	0.8	13	1.8
Light Duty Vehicles (More Than 6000 lbs. GVWR)			
1981-1983	3.4	70	4.5
1984-1987	1.6	40	4.5
1988-1995	1.6	40	3.5
1996 & Newer	0.8	15	2.0